

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Sean M. Bing,

Debtor.

Case No. 5:22-bk-00772-MJC

Chapter 13

**DEBTOR'S ELECTION TO CONVERT
CHAPTER 13 CASE TO CHAPTER 7**

WHEREAS, Debtor Sean M. Bing filed this case through Next Friend Carol Bing under chapter 13 on April 26, 2022, and

WHEREAS, this case was filed to prevent foreclosure of the Debtor's property at 149 Bon Sher Drive by repaying mortgage arrears through a chapter 13 plan, and

WHEREAS, when attempting to prepare a chapter 13 plan it became apparent that any such plan would be infeasible because of the substantial mortgage arrears due, and

WHEREAS, the Debtor has an absolute right to convert this case to a case under chapter 7 pursuant to 11 U.S.C. § 1307(a), and

WHEREAS, given the circumstances, the most appropriate course of action is to convert this case to a case under chapter 7 to allow for surrender of the property and a discharge of the underlying debt.

NOW, THEREFORE, the Debtor respectfully requests that this Court convert this chapter 13 case to a case under chapter 7.

Date: August 12, 2022

/s/ Carol Bing
Carol Bing
Next Friend of Debtor Sean M. Bing